

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
SEP 27 2004

SEP 27 P 2:45

UNITED STATES OF AMERICA )  
Plaintiff )

v. )

LOI VAN NGUYEN )  
Defendant )

CRIMINAL COMPLAINT  
CASE NO. 04-10086-RCL

U.S. DISTRICT COURT  
DISTRICT OF MASS

**ASSENTED TO MOTION TO CONTINUE**  
**DATE FOR CHANGE OF PLEA AND SENTENCING**

NOW COMES the Defendant, Loi Van Nguyen, by and through undersigned Counsel, and respectfully requests an order of this Honorable Court continuing the Change of Plea and Sentencing Hearing date in the above-captioned action, currently scheduled for Wednesday, September 8, 2004 at 2:00 p.m. to Wednesday, October 6, 2004 or a date thereafter and as reasons therefore states as follows:

1. The Defendant has entered into a Plea Agreement with the government, dated March 23, 2004. The Plea Agreement in the above-captioned matter, calls for a potential downward departure pursuant to U.S.S.G. § 5K 1.1, however the government needs additional time to review the matter to determine whether such motion will be filed.
2. The additional time will allow the government an opportunity to review this matter and allow both parties to prepare for the Sentencing Hearing in this matter.
3. The Defendant agrees that the time should be excluded under the Speedy Trial Act pursuant to 18 U.S.C § 3161(h)(8).

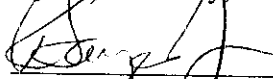
4. Counsel for the government, Assistant United States Attorney Laura J. Kaplan, assents to the within motion.

WHEREFORE, the Defendant requests that this Honorable Court allow this Assented to Motion to Continue.

Respectfully submitted

Loi Van Ngyuen

By His Attorney,



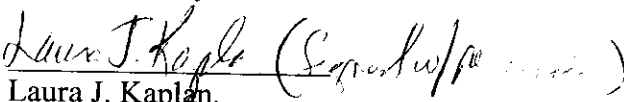
Raymond Sayeg, BBO #555437  
Law Offices of Raymond Sayeg  
Four Longfellow Place, 35<sup>th</sup> Floor  
Boston, MA 02114  
(617) 742-1184

Dated: August 25, 2004

Assented to:

United States of America

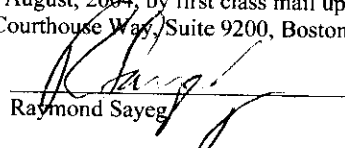
By Its Attorney



Laura J. Kaplan,  
Assistant United States Attorney  
U.S. Courthouse  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617)748-3124

**CERTIFICATE OF SERVICE**

I, Raymond Sayeg, hereby certify that a true and exact copy of the foregoing Assented to Motion to Continue Date for Change of Plea and Sentencing was served this 25 day of August, 2004, by first class mail upon United States District Attorney, Laura J. Kaplan, U.S. Attorney's Office, 1 Courthouse Way, Suite 9200, Boston, MA 02210.

  
Raymond Sayeg